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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Opposition of Union Pacific Railroad to RM No. 10687

The Union Pacific Railroad (UPRR) is opposed to the request of the Industrial Telecommunications Association ("ITA") to become certified to coordinate frequencies designated as railroad channels in the FCC's rules.

UPRR is an operating subsidiary of Union Pacific Corporation. It is the largest railroad in North America, operating in the western two-thirds of the United States. The railroad serves 23 states, linking every major West Coast and Gulf Coast port, and provides service to the east through its four major gateways in Chicago, St. Louis, Memphis and New Orleans. Additionally, UPRR operates key north-south corridors, is the only railroad to serve all six gateways to Mexico, and interchanges traffic with the Canadian rail systems. UPRR is the nation's largest hauler of chemicals, much of which originates along the Gulf Coast near Houston, Texas. It is also one of the nation's largest intermodal carriers, that is, the rail transport of truck trailers and containers.

As explained in the "Opposition of the Association of American Railroads (AAR)," which was filed as part of this rulemaking proceeding, mobile radio usage by railroads is very specialized and unique, involving requirements such as nationwide interoperability of equipment: a consensus-based industry wide channel plan that is no less than continental in its geographic scope (*i.e.*, encompassing both the United States and Canada); and special onboard and wayside applications such as two-way end-of-train links, "talking" defect detectors, and other railroad-specific communications devices deployed throughout the rail network.

Specialized knowledge of railroad operations is absolutely essential for the correct performance of the frequency coordination function for these important safety-related communications links. AAR possesses that specialized knowledge, and has done an excellent job for decades coordinating frequencies for railroad use so as to avoid interference and maximize spectrum utilization.

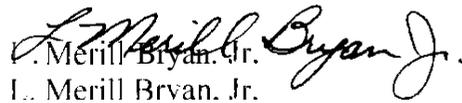
L. Merrill Bryan, Jr.
Sr. V. P. & C. I. O.

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UPRR is opposed to allowing multiple organizations to be frequency coordinators for railroad channels, particularly organizations such as **ITA**, which has no experience or knowledge concerning railroad operations. It is UPRR's strong belief that opening the door to multiple coordinators would be a major disservice to the nation's railroads, their customers, and the public. It would create chaos in the railroad industry's spectrum planning process; unnecessarily complicate the frequency coordination function; and lead to erroneous coordination decisions that will inevitably result in harmful interference to radio communications and consequent disruption of train movements and railroad operations.

UPRR respectfully urges the FCC to deny the ITA petition

Sincerely,


L. Merrill Bryan, Jr.

cc: Mr. Jeremy Denton
Industrial Telecommunications Assoc.
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